

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

**TROPHY HOSPITALITY,
LLC**

Debtor

**Case No. 21-40512
Chapter 11**

**MOTION OF SUBCHAPTER V TRUSTEE
FOR POST-PETITION SECURITY DEPOSIT**

YOUR RIGHTS MAY BE AFFECTED BY THE RELIEF SOUGHT IN THIS PLEADING. YOU SHOULD READ THIS PLEADING CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. IF YOU OPPOSE THE RELIEF SOUGHT BY THIS PLEADING, YOU MUST FILE A WRITTEN OBJECTION, EXPLAINING THE FACTUAL AND/OR LEGAL BASIS FOR OPPOSING THE RELIEF.

NO HEARING WILL BE CONDUCTED ON THIS APPLICATION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE SHOWN IN THE CERTIFICATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING WITH APPROPRIATE NOTICE. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

COMES NOW SCOTT M. Seidel, Subchapter V Trustee (the “Trustee”) in the above-numbered bankruptcy case, and files this his *Motion for Post-Petition Security Deposit* (the “Motion”) pursuant to LBR 2016(e) and in support hereof, would show the Court the following:

1. This case was filed under Chapter 11 of the Bankruptcy Code on April 8, 2021 and was designated as a Subchapter V Chapter 11 case.
2. On April 15, 2021, the Trustee was appointed.
3. Pursuant to this Motion, Trustee requests a post-petition security deposit or retainer of \$6,000.00 paid in three (3) monthly installments of \$2,000.00 with the first installment due upon Court approval and the remaining monthly installments paid on the same day of each succeeding month.
4. Trustee shall hold such funds in a federally insured account until such time as Trustee’s fees and expenses have been approved by an order of this Court or upon further order of

this court.

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that this Motion be approved by this Court under the terms specified above, and for such other and further relief to which he may show himself to be justly entitled.

Respectfully Submitted,

/s/ Scott M. Seidel
Scott M. Seidel, Esq.

SUBCHAPTER V TRUSTEE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing instrument was served on the parties on the attached mailing list in accordance with LBR 9013(f) either through the Court's electronic notification system as permitted by Appendix 5005 III. E. to the Local Rules of the U.S. Bankruptcy Court for the Eastern District of Texas, or by first class United States Mail, postage prepaid on this the 16th day of April 2021.

/s/ Scott M. Seidel
Scott M. Seidel